

Last Updated: November 10, 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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XIAMIN ZENG	:	CIVIL ACTION NO.: 19-CV-3218(JGK) (KHP)
	:	
	:	
Plaintiff,	:	
	:	
against	:	
	:	
	:	
CHELL et al.,	:	
	:	
Defendant.	:	
	:	
	X	

PROPOSED CASE MANAGEMENT PLAN FOR PRO SE CASE

1. Summary of Claims, Defenses, and Relevant Issues.

Plaintiff/Defendant (circle one)

Plaintiff alleges, inter alia, that on or about January 31, 2018, she was falsely arrested and maliciously prosecuted by members of the NYPD, Administration for Children's Services, Child Protective Services, and the Queens Child Advocacy Center. Plaintiff's arrest and subsequent prosecution was warranted by the existence of probable cause by virtue of an active Order of Protection and an open I-Card for probable cause to arrest.

2. I understand my obligation to and am preserving relevant information.

Plaintiff/Defendant (circle one)

3. Proposed Schedule

All discovery should be completed by November 19, 2020

- a. Depositions: Depositions shall be completed by November 19, 2020
- b. Neither party may take more than 1 depositions. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.

- c. Initial Requests for Documents must be made by August 6, 2020
- d. Responses to Requests for Documents must be made by September 8, 2020.
- e. Documents from third-parties (such as doctors) will/will not (circle one) be required. If required, the following are the third-parties from whom Documents will be requested.
- None at this time.
- _____
- _____
- _____
- _____
- f. Subpoenas requesting Documents from third-parties must be served by October 8, 2020. Documents obtained from third-parties must be provided to all parties in this matter.
- g. There will/will ~~not~~ (circle one) be expert testimony in this case. If expert testimony will be needed, please describe the topic on which the expert(s) is expected to testify
- N/A
- _____
- _____
- _____

4. Early Settlement or Resolution

The parties have/have not (circle one) discussed the possibility of settlement. The parties request a settlement conference by no later than N/A. The following information is needed before settlement can be discussed:

The undersigned has been unable to reach plaintiff. Thus no settlement discussions have taken place.

5. Other Matters

Plaintiff(s)/Defendant(s) (circle one) wish to discuss the following additional matters at the Initial Case Management Conference.

The fact that the current health crisis may impact the proposed dates in the Case Management Plan.

Respectfully submitted this 13 day of April.

Stephanie De Angelis

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Party representing (if applicable)

